

EXHIBIT A

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 HOUSTON DIVISION

4 THOMAS TAYLOR,)
5)
6 Plaintiff,)
7)
8 vs.) (Judge David Hittner)
9) CIVIL ACTION
10 SCHOOL OF THE WOODS,) NO.: 4:23-cv-00843
11)
12 Defendant.)

13 -----
14 ORAL DEPOSITION OF
15 THOMAS TAYLOR
16 OCTOBER 25, 2023
17 -----
18 -----
19 ORAL DEPOSITION OF THOMAS TAYLOR, produced as a
20 witness at the instance of the DEFENDANT, and duly
21 sworn, was taken in the above-styled and numbered cause
22 on the 25th of October, 2023, from 9:33 a.m. to 2:16
23 p.m., before Velma C. LaChausse, CSR and Notary Public
24 in and for the State of Texas, reported by machine
25 shorthand, at the Beacon Ballroom, 2800 Post Oak
 Boulevard, Houston, Texas 77056, pursuant to the Federal
 Rules of Civil Procedure and the provisions stated on
 the record or attached hereto.

1 A. Okay. I -- I have a bachelor's degree from
2 Georgia Institute of Technology. I -- I also have an
3 associate's degree from Middle Georgia College, so
4 that's my college education. And I've worked primarily
5 as an engineer for most of my career, and I transitioned
6 to teaching in 2019.

7 Q. Okay. Let's -- I'm going to show you what's
8 been marked as Exhibit 1.

9 (Exhibit No. 1 was marked.)

10 Q. (BY MR. BANES) Okay. When I show you exhibits
11 as we're going through here, I'm going to ask you to
12 identify the exhibit. When I ask that, it just means
13 tell me generally what it is and, you know -- or if you
14 recognize it.

15 So can you please identify Exhibit -- what
16 we've marked as Exhibit 1 for the record?

17 A. This is a version of my résumé.

18 Q. Is there a -- is there a more recent version of
19 this?

20 A. Yes.

21 Q. And what is -- what is this résumé -- what
22 period of time does this résumé go through?

A. It looks like this one is from 2016.

24 Q. Okay. And what -- if we start -- so is it --
25 is it a -- is it fairly accurate up to that point in

1 terms of your work and educational background?

2 A. To the best of my knowledge, yes.

3 Q. And is there anything you would add to it for
4 that period that might be missing that would be
5 important to us here?

6 A. I don't see anything.

7 Q. And starting in 2016 when this ends, sir, what
8 would you add to it since that time?

9 A. I worked at School of the Woods.

10 Q. Well, let's start in 2016 when you -- when did
11 you leave GE Oil & Gas?

12 A. 2016.

13 Q. All right. What -- what -- what date or month
14 at least?

15 A. I don't recall.

16 Q. All right. Do you know if it was closer to
17 maybe the 4th of July? Or, you know, is there a holiday
18 reference that we can do or --

19 A. I -- I don't recall.

20 Q. All right. So just sometime in 2016?

21 A. (Nodding head.)

22 Q. Did you -- did you go work anywhere else after
23 you left GE?

24 A. Not immediately.

25 Q. And when was the -- when was your next job?

1 Q. Do you remember about when you started the --
2 at that School of the Woods?

3 A. It was about June 10th of -- of 2019.

4 Q. Let me just ask this before I move on to that.

5 Why did you seek any guidance on your study
6 guides?

7 A. Why did I seek guidance on my study guides?

8 Q. Yes.

9 A. It was part of the training.

10 Q. Okay. In what regard?

11 A. It was just part of the training.

12 Q. Just seeking guidance on your study guides was
13 part of the training that was something that was
14 recommended by the school in its training?

15 A. Yes.

16 Q. All right. I marked it -- this has already
17 been marked as Exhibit 2.

18 (Exhibit No. 2 was marked.)

19 Q. (BY MR. BANES) Mr. Taylor, can you please
20 identify this document for the record that's been marked
21 as Exhibit 2?

22 A. Its -- its title is "Teacher Agreement of
23 Employment."

24 Q. Do you know whether this was your agreement
25 with the school when you started the -- at -- at the

1 beginning?

2 A. No, I don't.

3 Q. All right. Well, I'll represent to you that
4 this has been presented to us as your agreement at the
5 school.

6 Do you -- did you have -- was there some
7 other document that you thought might have been your
8 agreement other than this one?

9 A. This -- I have not signed this document.

10 Q. I know. So you didn't have an agreement with
11 the school when you started?

12 A. I was given a draft document.

13 Q. All right. Did you ever sign it?

14 A. No.

15 Q. So you never signed an agreement with the
16 school?

17 A. Not that I recall.

18 Q. So there was -- so either one of you could
19 terminate it at any time?

20 A. I don't know the -- the conditions of that.

21 Q. Well, I mean, you know, so there wasn't
22 anything locked in at all between the parties?

23 A. I don't know the -- the conditions of an
24 agreement I didn't sign.

25 Q. Well, this one says it -- it -- it has a term

1 in it. Right? It says from the school year starting
2 August 19th and terminating on June 2nd?

3 A. Okay.

4 Q. So are you telling me and the court that you
5 don't believe there was ever an agreement on any term?

6 A. I don't recall signing a contract.

7 Q. Okay. So you just started, and you -- did you
8 think you -- you were just at will?

9 A. I thought it was the same employment conditions
10 as I had previously.

11 Q. So what did you have -- what did you have
12 previously?

13 A. I was an employee of GE Oil & Gas.

14 Q. Could you leave at any time?

15 A. With reasonable notice.

16 Q. Well, I mean, you know, did you have -- did you
17 really have to give any notice?

18 A. I don't know.

19 Q. All right. And so the duties and
20 responsibilities contained in this document, do those
21 look accurate?

22 A. I don't know.

23 Q. All right. So you're looking right at me. You
24 haven't read it. So why don't you read it and tell me
25 if it's -- if it -- if it looks accurate.

1 Right?

2 A. Yes, and I did. I did. I did that. I -- I
3 called out --

4 Q. All right. Well, we'll get to that in a
5 second.

6 A. -- sexual harassment.

7 Q. We'll get to that in a second.

8 Right now, I'm just asking you if you saw
9 sexual, you know, harassment based on sexual orientation
10 or sexual harassment or anything like that, you believe
11 you had an obligation to talk -- to point it out and
12 complain about it. Right?

13 A. That's my personal. I did not understand that
14 as part of school policy.

15 Q. You didn't under -- well, did you -- do you
16 remember reading this part?

17 A. I -- I said I had not.

18 Q. All right. So -- so you didn't read this part,
19 so you didn't know what the policy was?

20 A. I don't recall seeing this part.

21 Q. All right. Let's take a look at page 31, which
22 is School of the Woods 35, or SOTW 35 Bates stamp.

23 MR. DUPREE: 31 or 35?

24 MR. BANES: It's page 31.

25 MR. DUPREE: Oh.

1 the training to the start of school, John and I had
2 agreed to carpool when school started. So at some point
3 during that time period between the end of my training
4 and when the students arrived, I recall a conversation
5 in the car that John started with the preface, if anyone
6 ever asks me about this, I'll deny it. And then there
7 was a second preface that was along the lines of, I know
8 you know that I'm out at School of the Woods as gay, and
9 that Matt has attended events here. And that it's okay.

10 And then there was a "but," and he said,
11 but it would be best if you are not out to students and
12 parents. And that was because of some concerns he had
13 about some specific parents, which he did not name at
14 that time, and he assured me it would be okay with
15 employees of the school.

16 So there was parents who were employees of
17 the school that was not a problem or other employees of
18 the school. But specifically to parents in general and
19 to students, he said I should not be out, that that
20 could cause problems for the school.

21 Q. Well, did he -- so during that conversation, he
22 didn't express that the school had any problem with you
23 being gay?

24 A. He told me that this was not just him, that
25 someone else had asked him to have this conversation

1 that would -- that would coincide.

2 Yeah, there was -- do you remember a
3 meeting with the boys?

4 A. Yes.

5 Q. All right. Yeah. So, I mean, you know, I -- I
6 mean, you -- you and Dr. Branch -- I mean, there was --
7 there was an incident in December of 2019 where some
8 boys were acting inappropriately that were high school
9 students?

10 A. Yes.

11 Q. And the school did take action about it, didn't
12 they?

13 A. The students acted. The -- the school did act
14 on the students. But amongst the faculty and -- and
15 administration after the fact, it was -- it was treated
16 as if it had all been blown out of proportion.

17 Q. Well, but -- and who -- and who treated it that
18 way? I don't see -- and I don't see any e-mails about
19 that.

20 Did you complain about that at the time?

21 A. I did speak up about it.

22 Q. Would that have been in a teacher meeting?

23 A. Yes.

24 Q. Do you know whether that was recorded or not?

25 A. No, I don't know.

1 Dr. Coe about that?

2 A. He knew that I had already talked to Dr. Coe
3 about that.

4 Q. And what did Dr. Coe say?

5 A. I spoke with Dr. Coe in the fall of 2019 after
6 I had spoken with Ms. Herron about the -- specifically
7 about the conversation I had in the car with John. And
8 Dr. Coe responded -- I can't remember anything she said.
9 She -- as I recall, she didn't really say much of
10 anything at all.

11 Her expression and her demeanor was anger
12 at me for bringing the subject up, and I assured her, in
13 response to her demeanor, that I had no intention of
14 speaking with students or parents about my sexual
15 orientation.

16 Q. But did -- she didn't say anything?

17 A. She gave me an angry look.

18 Q. What exactly did you say to her?

19 A. I went to her and I said that John had brought
20 the subject up and had said that it would be best for
21 the school if I was not out to students and parents.

22 Q. Did you disagree with that?

23 A. I told Dr. Coe that I would -- had no intention
24 of sharing my sexual orientation or anything about my
25 personal life with students and parents.

1 Q. Did you say that because you didn't think it
2 was appropriate anyway?

3 A. Well, I didn't think it was appropriate. My
4 purpose in talking to Dr. Coe -- I had already talked to
5 Ms. Herron. My purpose in talking to Dr. Coe was to try
6 to understand if she was the one who had asked John to
7 speak with me about this.

8 Q. Who -- now specifically, you were told not
9 to -- you know, you were told that it would not be a
10 good idea to discuss your sexual orientation with
11 students and parents?

12 A. Yes. That's what John --

13 Q. And Dr. Branch said that?

14 A. Yes.

15 Q. And he didn't tell you who told him to say it?

16 A. He did not.

17 Q. And when you raised it with Dr. Coe, she just
18 gave you an angry look, and you said, I don't plan on
19 discussing my sexual orientation with parents or
20 students anyway?

21 A. That's what I recall.

22 Q. And you agreed with that approach?

23 A. That's what I understood that they wanted me to
24 do, and I was agreeable to do that.

25 Q. Did you think -- did you want to discuss your

1 sexual orientation with students and parents?

2 A. No.

3 Q. Did you think it would be inappropriate to do
4 that?

5 A. No.

6 Q. Did you -- did you -- did you intend on -- did
7 you think that you were being asked to hide your -- your
8 sexual orientation from students or parents?

9 A. Yes.

10 Q. And who do you think asked you to do that?

11 A. John Branch.

12 Q. And did -- and did you tell him, I'm not going
13 to do that because I think it's appropriate for me to
14 tell students and parents that I -- about my sexual
15 orientation?

16 A. No, I agreed to not do it.

17 Q. All right.

18 A. And it was like the sword of Damocles over my
19 head the whole time I worked there.

20 Q. Now, let's address that.

21 Why do you think this is any different than
22 you being told to not discuss anything about your
23 personal life with students and parents?

24 A. Because that's not the instructions that other
25 teachers had.

1 Q. So other teachers were told to share it?

2 A. Other teachers did share.

3 Q. Well, and so did you -- did you tell Dr. Branch
4 at the time, that's unfair that you can do it and I
5 can't?

6 A. We did have that discussion. But over the
7 course of time -- not -- not so much in the original
8 meeting, but as we discussed this because as -- as I
9 told you, we discussed this several times. Over the
10 course of time, I came to realize that the matter had to
11 do with how many gay teachers there were.

12 As I started in the high school and I got
13 to know the other teachers and I -- and I got to know
14 [REDACTED] and [REDACTED] shared with me his
15 sexual orientation, then I was like, okay. So we have
16 five male teachers in this school, and three of them are
17 gay. And I was like, that's why John asked me to do
18 this.

19 And I went back to John, and I said, this
20 has to do with the number of gay teachers there are in
21 the school. So the school is, as he had said, generally
22 accepting of -- of him being gay and other people being
23 gay, but the problem came up with how many of us there
24 were in the high school specifically.

25 And John acknowledged -- John was very

1 tight-lipped, but he acknowledged that was correct.

2 Q. So did -- all right. So did he tell you that
3 that was the policy of the school not to hire a certain
4 number of gays?

5 A. John told me that there was concern that the
6 parents would raise issues if they found out that I was
7 gay.

8 Q. Okay. Well, now, that's different than the
9 school raising issues. Right? Parents always raise
10 issues about things with respect to their kids, don't
11 they?

12 A. I don't know.

13 Q. They ask a lot -- well, of course, you don't
14 really have much context.

15 But were you surprised that parents were
16 asking questions about, you know, where their kids are
17 going, who is teaching them, and, you know, their
18 backgrounds?

19 A. I was very concerned that this meant that there
20 would be issues that would be -- that would force the
21 school to act because of my sexual orientation.

22 Q. Well, you mean, because being open in your
23 sexual orientation, not because of your sexual
24 orientation. Right? Because the school never took any
25 action against you just because you were gay, did they?

1 A. They did.

2 Q. They did? They just -- I mean, they hired you.
3 Right? Knowing you were gay. Correct?

4 A. And when it became a problem for them, they
5 dismissed me.

6 Q. Well, that's your view. But we'll -- we'll
7 explore that.

8 But let's -- they -- they hired you knowing
9 you were gay. Right?

10 A. I don't --

11 Q. You weren't -- you weren't unequivocal about
12 that, were you?

13 A. I -- I don't know. I don't recall, but --

14 Q. Well, Dr. Branch knew you were gay. Right?

15 A. Yeah, yes.

16 Q. And if you were thinking of him as your
17 supervisor, you know --

18 A. He -- he -- he certainly did know I was gay,
19 yes.

20 Q. All right.

21 A. I don't know what he told Ms. Herron or Ms. --
22 Dr. Coe.

23 Q. Well, then, if you don't know if they knew,
24 then how do you connect -- how do you connect Dr. Coe
25 telling him to keep -- for you to keep it quiet if you

1 A. Ms. Herron.

2 Q. Did you have any discussions with Dr. Coe to
3 figure out what she -- what she meant by anything?

4 A. I don't recall.

5 Q. All right. Is there anything you could look at
6 to refresh your recollection?

7 A. I don't think that I did, but I don't recall
8 that I had any conversations.

9 Q. All right. So did you -- you went to -- when
10 did you have a discussion with Ms. Herron?

11 A. Probably just prior to this e-mail.

12 Q. All right. And what did you discuss with her?

13 A. We went through the study guide. I explained
14 what I was doing. And she asked for this information in
15 this e-mail, so I sent it to her.

16 Q. Did you express to Ms. Herron at that time that
17 you thought -- you felt that Dr. Coe was focusing on you
18 because of your sexual orientation or other reasons?

19 A. I -- I made it clear that -- that it was
20 harassment.

21 Q. Yeah, but that's not what I asked. I asked did
22 you -- did you have a discussion with Ms. -- Ms. Herron
23 leading up to this e-mail that you thought that Dr. Coe
24 was focusing on you because of your sexual orientation?

25 A. Not at this time, no. We did not have a

1 Q. But you don't say that here?

2 A. That's -- I did not do a good job of saying
3 that here.

4 Q. Well, you don't say it at all?

5 A. We had -- we had --

6 Q. That's just not a good job.

7 You don't express the harassment in the
8 context of sexual orientation at all?

9 A. We had -- we had talked. I was --

10 Q. In this e-mail, you don't -- you know, "yes" or
11 "no," I -- you did not express the context of harassment
12 in terms of your sexual orientation in this e-mail?

13 A. I -- I did not.

14 Q. All right. Now, the January 14th e-mail and
15 this April 29th e-mail are what you say in your EEOC
16 charge were your complaints about your harassment with
17 respect to sexual orientation. Correct?

18 A. Yes.

19 Q. But sitting here today, you can't point to
20 where in those documents that you expressed those
21 complaints with respect to your sexual orientation to
22 the school?

23 A. Those were in in-person discussions.

24 Q. Yeah. They're not in the e-mails at all.
25 Right?

1 A. I -- I did not use the word sexual orientation.

2 Q. Did you express in any of these e-mails that
3 you thought the reason was because of limitations that
4 you -- that you'd -- well, excuse me.

5 Did you express in either one of these
6 e-mails that you thought that you were being targeted
7 because of your physical or medical limitations?

8 A. What I was expressing here was that there were
9 physical and medical limitations or consequences of the
10 harassment that I had experienced.

11 Q. And what physical -- and -- now, so in what
12 context was that? Did you express to Ms. Herron that
13 you thought that you were being targeted because of your
14 physical or medical limitations?

15 A. What I was expressing here is that there were
16 medical and physical consequences that produced
17 limitations that were a consequence of the harassment.

18 Q. Did you get a note from a doctor saying that
19 you couldn't follow any school policies or something?

20 A. I did not get a note from a doctor.

21 Q. All right. Did you -- did you express to
22 Ms. Herron that a doctor had told you that you couldn't
23 do certain things and therefore -- and that -- and then
24 did Dr. Coe or Ms. Herron retaliate against you because
25 of that?

1 A. I -- I just said that I was experiencing high
2 blood pressure, agitation, sleepless nights. And that
3 there was consequences to the harassment. And that I
4 would need time to recover from that -- from the
5 physical components of that.

6 Q. All right. And well, without -- harassment is
7 a real -- well, all right.

8 A. Well --

9 Q. So did you tell Ms. Herron how long you would
10 need to recover?

11 A. Okay. What I said was "until the harassment is
12 acknowledged, stopped and I have time to recover there
13 is really nothing else to be done."

14 Q. So you didn't give a time?

15 A. I did not give a time, but I -- I -- I suggest
16 whatever time is required to cover -- to recover.

17 Q. Did you get a doctor's note telling -- and give
18 it to Ms. Herron about how long it would take you to
19 recover?

20 A. No.

21 Q. All right. Did you tell her that, I'm going to
22 go get a doctor's note, and I'll give it to you when
23 I -- when -- that -- about how long I'm going to need to
24 recover? Did you even offer to get one?

25 A. She responded to this, and we scheduled another

1 meeting.

2 Q. Did you show up at that meeting?

3 A. I was unable to attend that meeting because I
4 had to cover for Ms. Nicholson who was absent. And I --
5 so I let Ms. Herron know that I was covering for
6 Ms. Nicholson who was absent.

7 Q. Did you end up meeting with Ms. Nicholson -- or
8 Ms. Herron at a later point?

9 A. I did not hear from Ms. Herron again until she
10 called me in June to let me know that I was being
11 dismissed.

12 Q. Well, that your contract wasn't being renewed?
13 Did she tell you that you were being dismissed or that
14 your contract wasn't being renewed?

15 A. Okay. I don't recall.

16 Q. All right. Did you ever follow up with
17 Ms. Herron after this April 29th, 2021, e-mail to either
18 provide a doctor's note or tell her when you might be
19 able to recover?

20 A. I did not.

21 Q. All right.

22 MR. BANES: I -- that's all the questions I
23 have, Mr. Dupree.

24 Do you have any follow-up or any cross?

25 MR. DUPREE: We'll take a quick break, and

1 then we'll get back on the record.

2 Five minutes?

3 MR. BANES: Okay. Yeah, that's fine.

4 MR. DUPREE: All right.

5 MR. BANES: Thank you, sir.

6 (Recess taken.)

7 EXAMINATION

8 BY MR. DUPREE:

9 Q. All right. We're back on the record.

10 Mr. Taylor, earlier in your deposition
11 testimony, you were discussing a meeting with Ms. Herron
12 with Mr. Bryant.

13 Do you recall that discussion?

14 A. Oh, this is Mr. Bryant. Sorry.

15 Yes.

16 Q. Okay. So in that discussion, you referenced a
17 meeting with Sherry Herron in April of 2021.

18 Do you -- do you recall that?

19 A. Yes.

20 Q. Can you tell the court specifically what you
21 told Ms. Herron in that meeting?

22 A. What I specifically told her in that meeting
23 regarding my sexual orientation was I referred her back
24 to the meeting in August of 2019 where I had relayed to
25 her the -- the morning from John Branch and -- about

1 concerns that it would cause problems if parents found
2 out I was gay.

3 And I wanted to let her know that what was
4 happening then, right then, with the harassment I
5 experienced in -- since -- in 2021 was the end result of
6 that.

7 Q. Okay. End result of that -- the end result of
8 what? What specifically?

9 A. That process of the concern about me being out
10 to parents and students and how that might come back
11 into the school. And then that would -- would cause
12 problems, which could lead to my dismissal.

13 MR. DUPREE: Okay. I'll pass.

FURTHER EXAMINATION

15 | BY MR. BANES:

16 Q. Is that exactly what you said, Mr. --
17 Mr. Taylor?

18 A. I recall exactly saying, this is the end result
19 of that. And I recall referring back to the meeting in
20 2019, which was clearly about sexual orientation.

21 Q. So did it -- did you tie it together by telling
22 Ms. Herron all of the events that had happened since
23 2019 that led you to believe that the current effort was
24 because of that first meeting in 2019 with Dr. Coe?

25 A. I -- yes, but she was dismissive and shaking

1 her head the whole time and saying no.

2 Q. Okay. So can you go through each incident that
3 happened, like that -- that you told Ms. Herron about at
4 the time that happened since 2019 that led you to
5 believe that Dr. Coe was targeting you because of your
6 sexual orientation?

7 A. So it was the -- the warning from John in 2019.
8 The experience with Dr. Coe in late 2020, early 2021
9 where she was harassing me, and I responded to that in
10 the -- in the e-mail. And then what was going on with
11 Hailey Nicholson.

12 Q. Okay.

13 A. And the -- at -- what we were meeting at that
14 time.

15 Q. Anything else?

16 A. I don't remember anything else.

17 Q. All right. So how did you make the -- how did
18 you make the connection between what Ms. Nicholson was
19 asking you about and this alleged harassment with -- by
20 Dr. Coe?

21 A. Because I knew that Dr. Coe was going around
22 asking people to talk to me and --

23 Q. All right. Did somebody tell you that Dr. Coe
24 had talked to Dr. -- or Ms. -- Ms. Nicholson?

25 A. Not that Dr. Coe had talked to Ms. Nicholson.

1 John Branch told me that he talked -- she had talked to
2 him. And I -- I gathered from the conversations with
3 Karen Imas and with Demi Rodriguez Naylar that she had
4 talked with them also. And Ms. Villanueva had showed up
5 as well. So it seemed like there was just a steady...

6 Q. All right. Now, she talked to them about you
7 being gay?

8 A. She -- she was trying to raise concerns about
9 my teaching --

10 Q. All right.

11 A. -- because I was gay.

12 Q. So -- all right. And -- and you -- and -- and
13 Dr. Branch said that she's trying to raise issues about
14 you teaching because you're gay?

15 A. He did not say that.

16 Q. All right. And no one else said that either.
17 Right?

18 A. No.

19 Q. All right. You just think that Dr. Coe was
20 raising issues about your teaching because she didn't
21 like you were gay?

22 A. It was the concern -- it goes back to the
23 concern that John had -- had expressed. It wasn't that
24 Dr. Coe didn't like I was -- didn't like that I was gay.
25 It was that Dr. Coe was concerned about the problems

1 that having too many gay teachers in the high school
2 raised with certain parents.

3 Q. All right. So -- all right. Did -- did
4 Dr. Branch express that he was worried that him or the
5 other teacher, other than you, that was gay would be
6 targeted by Dr. Coe?

7 A. He did not express that.

8 Q. All right. Did he say that either one of them
9 were?

10 A. He did not say that.

11 Q. And you think that Dr. Coe targeted you not
12 because of your teaching methods, but because you're
13 gay?

14 A. Yes.

15 Q. And you -- and you tie that -- you don't tie
16 that to anything other than the initial conversation you
17 had about publicly expressing that you were gay?

18 A. The initial conversation I had with Dr. Coe
19 about that, yes.

20 Q. All right.

21 MR. BANES: All right. Nothing further.

22 MR. DUPREE: Nothing further.

23 THE REPORTER: Okay. Mr. Dupree, would you
24 like to order a copy?

25 MR. DUPREE: Yes, please.